

1 Karma M. Giulianelli (SBN 184175)
2 karma.giulianelli@bartlitbeck.com
3 **BARTLIT BECK LLP**
4 1801 Wewetta St., Suite 1200
5 Denver, Colorado 80202
6 Telephone: (303) 592-3100

7 Hae Sung Nam (*pro hac vice*)
8 hnam@kaplanfox.com
9 **KAPLAN FOX & KILSHEIMER LLP**
10 850 Third Avenue
11 New York, NY 10022
12 Tel.: (212) 687-1980

13 *Co-Lead Counsel for the Proposed Class in In re*
14 *Google Play Consumer Antitrust Litigation*

15 Steve W. Berman (*pro hac vice*)
16 steve@hbsslaw.com
17 **HAGENS BERMAN SOBOL SHAPIRO LLP**
18 1301 Second Ave., Suite 2000
19 Seattle, WA 98101
20 Telephone: (206) 623-7292

21 Eamon P. Kelly (*pro hac vice*)
22 ekelly@sperling-law.com
23 **SPERLING & SLATER P.C.**
24 55 W. Monroe, Suite 3200
25 Chicago, IL 60603
26 Telephone: 312-641-3200

27 *Co-Lead Counsel for the Proposed Class in In re*
28 *Google Play Developer Antitrust Litigation and*
Attorneys for Pure Sweat Basketball, Inc.

Bonny E. Sweeney (SBN 176174)
bsweeney@hausfeld.com
HAUSFELD LLP
600 Montgomery Street, Suite 3200
San Francisco, CA 94104
Telephone: (415) 633-1908

Co-Lead Counsel for the Proposed Class in In re
Google Play Developer Antitrust Litigation and
Attorneys for Peekya App Services, Inc.

[Additional counsel appear on signature page]

Glenn D. Pomerantz (SBN 112503)
glenn.pomerantz@mto.com
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, Fiftieth Floor
Los Angeles, California 90071
Telephone: (213) 683-9100

Brian C. Rocca (SBN 221576)
brian.rocca@morganlewis.com
MORGAN, LEWIS & BOCKIUS LLP
One Market, Spear Street Tower
San Francisco, CA 94105-1596
Telephone: (415) 442-1000

Daniel M. Petrocelli, Bar No. 97802
dpetrocelli@omm.com
O'MELVENY & MYERS LLP
1999 Avenue of the Stars, 7th Fl.
Los Angeles, CA 90067-6035
Telephone: (310) 553-6700

Counsel for Defendants Google LLC et al

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN FRANCISCO DIVISION
4

5 **IN RE GOOGLE PLAY STORE**
6 **ANTITRUST LITIGATION**

Case No. 3:21-md-02981-JD

7 THIS DOCUMENT RELATES TO:

8 *In re Google Play Consumer Antitrust*
9 *Litigation*, Case No. 3:20-cv-05761-JD

10 *In re Google Play Developer Antitrust*
11 *Litigation*, Case No. 3:20-cv-05792-JD

STIPULATED [PROPOSED] ORDER
MODIFYING SEALING PROCEDURES
RELATING TO CLASS
CERTIFICATION BRIEFING AND
RELATED DOCUMENTS

Courtroom: 11, 19th Floor (via Zoom)
Judge: Hon. James Donato

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2 WHEREAS, pursuant to this Court’s February 2, 2022 Amended MDL Scheduling Order
3 (MDL ECF No. 191), Plaintiffs served opening class certification expert reports on February 28,
4 2022; Google served opposition class certification expert reports on March 31, 2022; and Plaintiffs
5 served class certification expert rebuttal reports on April 25, 2022. The Consumer Plaintiffs and
6 Developer Plaintiffs will each file motions for class certification on May 26, 2022. The Google
7 Defendants will oppose those motions on June 23, 2022, and the Consumer Plaintiffs and
8 Developer Plaintiffs will file any reply briefs on July 14, 2022.

9 WHEREAS, Parties may file *Daubert* motions regarding class certification experts on May
10 26, 2022, oppositions to the *Daubert* motions on June 23, 2022, and replies to the *Daubert* motions
11 on July 14, 2022.

12 WHEREAS, Parties believe that because “voluminous or multiple administrative motions
13 to seal would be filed if normal procedures were followed,” the briefing on the Consumer
14 Plaintiffs’ and Developer Plaintiffs’ respective motions for class certification (and any *Daubert*
15 motions) are subject to the procedure set forth in Paragraph 31 of the Court’s Standing Order for
16 Civil Cases, which calls for the filing of a single combined administrative motion to seal covering
17 all unopposed sealing requests, and a single combined administrative motion to seal covering all
18 opposed requests, following the completion of briefing (“Omnibus Sealing Motions”).

19 WHEREAS, during a status conference before this Court on May 12, 2022, Parties raised
20 an administrative request to forego any motions to seal in the interim briefs, so that Parties could
21 submit only the Omnibus Sealing Motions contemplated by Paragraph 31 of this Court’s Standing
22 Order for Civil Cases; and the Parties understood the Court to be amenable to this request..

23 WHEREAS, given that Paragraph 31 appears to suggest that the Omnibus Sealing Motions
24 will supersede any interim sealing motions that would ordinarily accompany Parties’ opening
25 briefs, opposition briefs, and reply briefs, Parties believe it will be most efficient to handle all
26 sealing issues in Omnibus Sealing Motions to be filed following the class certification and *Daubert*
27 briefings.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED:

- Parties shall file redacted versions of class certification and (if necessary) *Daubert* briefs and supporting documents on May 26, June 23, and July 14, 2022, without accompanying interim motions to seal; and
- Parties and non-parties shall jointly file Omnibus Sealing Motions on July 28, 2022 (i.e., two weeks after the completion of the class certification briefings), or any date that this Court chooses following the completion of class certification briefing.

Dated: May 23, 2022

BARTLIT BECK LLP
Karma M. Giulianelli

KAPLAN FOX & KILSHEIMER LLP
Hae Sung Nam

Respectfully submitted,

By: /s/ Karma Giulianelli
Karma M. Giulianelli

*Co-Lead Counsel for the Proposed Class in
In re Google Play Consumer Antitrust
Litigation*

Dated: May 23, 2022

PRITZKER LEVINE LLP
Elizabeth C. Pritzker

Respectfully submitted,

By: /s/ Elizabeth Pritzker
Elizabeth C. Pritzker

*Liaison Counsel for the Proposed Class in
In re Google Play Consumer Antitrust
Litigation*

1 Dated: May 23, 2022

HAGENS BERMAN SOBOL SHAPIRO LLP
Steve W. Berman
Robert F. Lopez
Benjamin J. Siegel

2
3
4 SPERLING & SLATER PC
Joseph M. Vanek
Eamon P. Kelly
5 Alberto Rodriguez

6 Respectfully submitted,

7
8 By: /s/ Steve Berman
Steve W. Berman

9
10 *Co-Lead Interim Class Counsel for the
Developer Class and Attorneys for Plaintiff
Pure Sweat Basketball*

11 Dated: May 23, 2022

HAUSFELD LLP
Bonny E. Sweeney
12 Melinda R. Coolidge
13 Katie R. Beran
14 Scott A. Martin
Irving Scher

15 Respectfully submitted,

16 By: /s/ Bonny Sweeney
Bonny E. Sweeney

17
18 *Co-Lead Interim Class Counsel for the
Developer Class and Attorneys for Plaintiff
19 Peekya App Services, Inc.*

1 Dated: May 23, 2022

MORGAN, LEWIS & BOCKIUS LLP

Brian C. Rocca
Sujal J. Shah
Minna L. Naranjo
Rishi P. Satia
Michelle Park Chiu

2
3
4 Respectfully submitted,

5
6 By: /s/ Brian Rocca
Brian C. Rocca

7
8 *Counsel for Defendants Google LLC et al.*

9
10 Dated: May 23, 2022

O'MELVENY & MYERS LLP

Daniel M. Petrocelli
Ian Simmons
Benjamin G. Bradshaw
Stephen J. McIntyre

11
12
13 Respectfully submitted,

14 By: /s/ Daniel Petrocelli
Daniel M. Petrocelli

15
16 *Counsel for Defendants Google LLC et al.*

17
18 Dated: May 23, 2022

MUNGER, TOLLES & OLSON LLP

Glenn D. Pomerantz
Kyle W. Mach
Kuruvilla Olasa
Justin P. Raphael
Emily C. Curran-Huberty
Jonathan I. Kravis

19
20
21
22 Respectfully submitted,

23 By: /s/ Glenn Pomerantz
Glenn D. Pomerantz

24
25
26 *Counsel for Defendants Google LLC et al.*

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

2 Dated: _____

3 HON. JAMES DONATO
4 United States District Judge

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9 **E-FILING ATTESTATION**

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11 I, Brian C. Rocca, am the ECF User whose ID and password are being used to file
12 this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the
13 signatories identified above has concurred in this filing.

14 */s/ Brian Rocca*
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